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**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WICHITA FALLS DIVISION**

IN RE:

**MICHAEL EDWARD LEDUE and
CONSTANCE ELLEN LEDUE**

Debtors

§
§
§
§
§

CASE NO. 19-70323-HDH-11

CHAPTER 11

AMENDED MOTION FOR CRAMDOWN
(Related Document #44)

TO THE HONORABLE HARLIN D. HALE, UNITED STATES BANKRUPTCY JUDGE”

Debtors, Michael Edward Ledue and Constance Ellen Ledue, move the Court for an order confirming the plan pursuant to 11 U.S.C. §1129(b)(1).

In support of this Motion, Debtors respectfully represent as follows:

1. Debtors filed for relief under Chapter 11 of Title 11 on November 4, 2019.
2. This Court has jurisdiction over this matter pursuant to 28 U.S.C.A. §§ 157 and 1334.

This is a core proceeding pursuant to 28 U.S.C.A. § 157(b)(2)(L).

3. Debtors are individuals involved with real estate rentals and construction.
4. Debtors filed their initial Plan of Reorganization on May 1, 2020, and their amended Plan (“Plan”) on May 5, 2020.
5. Objections to confirmation were due on June 8, 2020.
6. Votes to accept or reject the Plan were due on June 8, 2020.

7. The creditors listed on Exhibit "1" did not file any vote concerning the Plan.
8. Debtors are not under any orders to pay any domestic support obligations.
9. Class 3< Union Square Credit Union, is impaired and has voted for the Plan.

WHEREFORE, Debtors respectfully request the Court to enter an Order Confirming the Plan and grant such other relief as the Court deems just and proper.

Respectfully submitted,

/s/ John A. Leonard
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CERTIFICATE OF SERVICE

I hereby certify that on this the 8th day of April 2020, a true and correct copy of the above and foregoing Motion was sent to the following entities:

United States Trustee	ECF
All persons filing a notice of appearance	ECF
All other creditors and parties-in-interest	First Class Mail

LEONARD, KEY & KEY, PLLC.

/s/ John A. Leonard
John A. Leonard

EXHIBIT “1”

Exhibit 1

Action Battery
Asco
Atmos
Bio City
Bruckners
Dodge
Dolese
Federated
First Capital
FirstCapital
Fowler
Kubota
Power Plan
Southern Tire
T&W Tire
Tech Air
Tommy Smyth
Tugman
Unifirst
US Lime
Western
Wichita Bearing
Wyatt
Zack Burkett